

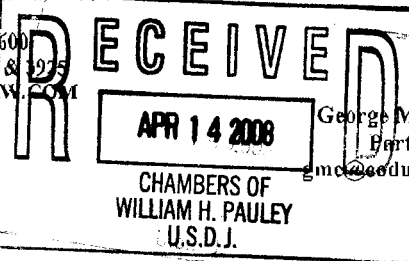
CHALOS, O'CONNOR & DUFFY

ATTORNEYS AT LAW

Michael G. Chalos
Eugene J. O'Connor
George M. Chalos**^
Owen F. Duffy
Leroy S. Corsa
Timothy Semeroro*
Brian T. McCarthy
George E. Murray

366 MAIN STREET
PORT WASHINGTON, NEW YORK 11050-3120

TELEPHONE (516) 767-3600
TELECOPIER (516) 767-3605 & 3275
WEBSITE: WWW.CODUS-LAW.COM



* Admitted in NY & NJ
** Admitted in USDC-SD Tx & ED Tx
^ Admitted in USDC-CT

MEMO ENDORSED

April 14, 2008

Via Telefax

Honorable William H. Pauley III
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 2210
New York, New York 10007-1312
Telefax Number: (212) 805-6390

Re: Norton Lilly Int'l & Security Services Northwest, Inc. v. National Navigation Co., et al.
07 CV 4654 (WHP)
CO&D Ref: 500065.0077

Request for Sixty (60) Day Adjournment of Pre-Trial Conference

Dear Judge Pauley:

We are the attorneys for the Plaintiff, Norton Lilly Int'l & Security Services Northwest, Inc., in the above referenced matter. On July 3, 2007, Your Honor ordered that a Pre-Trial Conference be held in this matter on August 24, 2007 at 10:00 a.m. As the defendant had yet to appear, the matter was subsequently adjourned to October 26, 2007. On October 22, 2007, Plaintiffs requested an adjournment of the October 26, 2007, Conference, as the defendant had yet to appear, which Your Honor granted and was rescheduled for Friday, January 18, 2008 at 10:00 a.m. On January 15, 2008, Plaintiffs requested an adjournment of the January 18, 2008, Conference, which Your Honor granted, rescheduling the Conference for Friday, April 4, 2008, at 11:45 a.m. On Thursday April 3, 2008, undersigned counsel was contacted by Your Honor's Clerk, informing us that the Conference had been rescheduled for Wednesday, April 16, 2008, at 11:45 a.m.

In review, this case is being heard under this Court's Admiralty and Maritime Jurisdiction. It is a maritime claim for \$51,944.60. On June 5, 2007, Your Honor signed an Order for the Issuance of Process of Maritime Attachment in this action pursuant to Rule B of the Federal Supplemental Rules for Certain Admiralty and Maritime Claims. Subsequently, the

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Clerk of the Court for the Southern District of New York issued a Process of Maritime Attachment in this matter.

Further, on June 19, 2007, pursuant to Federal Rule of Civil Procedure 41(a)(1), Plaintiffs filed a Notice of Voluntary Dismissal as to Defendant Louis Dreyfus Corp. The Dismissal was so ordered by Your Honor on July 6, 2007.

Finally, on July 27, 2007, Plaintiffs filed a Motion to Amend the Caption in this matter in order to have the caption accurately reflect the parties that remain in the action. This Motion was granted and on September 21, 2007, Your Honor signed an amended Order for the Issuance of a Process of Maritime Attachment. The Clerk of the Court for the Southern District of New York subsequently issued a Process of Maritime Attachment.

The remaining Defendant, National Navigation Co., has not appeared in this matter. Furthermore, as stated in the Declaration of George M. Chalos, dated July 27, 2007, that was previously submitted to Your Honor, and as required by Supplemental Rule B, Defendant National Navigation Co. is not present within the Southern District of New York. Additionally, no funds have been attached in this matter, although Plaintiff believes that attachable funds may soon be present in the Southern District of New York.

Unfortunately, a friend and colleague of the undersigned counsel has passed away over the past weekend and I am presently trying to arrange a flight to New Orleans for the wake and funeral this coming Wednesday. As such, I will not be available on Wednesday, April 16, 2008, to attend the Pre-Trial Conference presently scheduled in this matter and kindly request the Court's understanding. Under these circumstances, and pursuant to Your Individual Practice Rule 1E, Plaintiffs would like to respectfully request a sixty (60) day adjournment of the Pre-Trial conference set for Wednesday, April 16, 2008, at 11:45 a.m. This is the third request for an adjournment in this matter and the Defendant has not yet appeared in this action.

Thanking this Honorable Court for its time and consideration, we remain,

Respectfully yours,

CHALOS, O'CONNOR & DUFFY

George M. Chalos

GMC/gkk

Application granted.
SO ORDERED:


WILLIAM H. PAULEY III U.S.D.J.

4/16/08

The initial pre-trial conference
is adjourned to May 29, 2008
at 11:00 a.m.